Shared Strategy for Puget Sound
Comments on April 2007 Three-Year Work Program Update
Hood Canal Watershed

Introduction

In April 2007, watersheds submitted three-year work program updates on accomplishments and proposed actions that built on the 2006 three-year work program they developed to get on a recovery trajectory in the first three years of implementation.

This feedback is intended to assist the watershed recovery plan implementation team as it continues to address actions and implementation of their salmon recovery plan. The feedback is also being used by the TRT and Recovery Council Work Group to inform the continued development and implementation of the regional work program components such as adaptive management. The feedback will also stimulate further discussion on recovery objectives to determine what the best investments are for salmon recovery over the next three years.

Guidance for the 2007 work program updates

Guidance for the preparation of the 3-year work program update emphasized the importance of stating what has changed in the Update of the 3-year work program from the prior adopted work program. Watersheds were asked to:

- Describe why you have made the changes proposed, including rationale for including, omitting, or changing the rank of a project;
- Describe any adjustments related to considering sequencing, timing, or H-Integration issues; and
- Discuss the status of implementation of your three-year work program – what have you accomplished in terms of the priority actions, what have you struggled with and how have you resolved it, and provide suggestions, if the issues were not resolved, on how we might work together to improve the situation in the future.

The guidance for preparation of the work program update provided the following as factors to be considered by the Puget Sound Technical Recovery Team in performing its technical review of the Update:

a. Is the Update consistent with the hypotheses and strategy for the watershed's work program?
b. Is the sequencing and timing of the actions in your updated 3-year work program appropriate for this first full year of implementation of the Puget Sound Salmon Recovery Plan?
c. Are there significant components missing from the work program? Is so, what are these and what can be done about them in the 3-year work program update or at a regional scale?

Watersheds were provided with the following 7 questions that the Recovery Council Work Group would address in performing its policy review of the Three-Year Work Program.

1. Is the work program consistent with the policy feedback and recommendations from the 2004 documents, Puget Sound Salmon Recovery Plan (See Volume I, Watershed Profiles – Results section) and the NMFS supplement to the Puget Sound Salmon Recovery Plan, as well as the regional nearshore chapter guidance, where applicable?
2. Is the work program tied to the identified three-year objectives and scheduled to proceed at a pace sufficient to achieve the watershed's ten- year goals?
3. Is the work program narrative tightly linked to individual projects and priorities?
4. To what extent do programmatic actions address protection identified in the work program and non-capital project list?
5. To what extent are habitat, harvest and habitat actions integrated and included in the work program?
6. To what extent does the work program address the watershed's capacity to implement the updated three-year work program?

Guidance noted that the Work Group would also examine the objectives of the three-year work program and how well the program addresses them. This includes considering whether the Work Program Update:

- Improves the level and certainty of protection for habitat and the 22 existing Chinook populations;
- Preserves options for achieving the future role of this population in the ESU;
- Ensures protection and restoration that preserves and restores ecosystem processes for Chinook, and
- Advances the coordinated/integrated management of harvest, hatchery and habitat.

Puget Sound Technical Recovery Team Review

The TRT reviewed fourteen individual watershed salmon recovery 3-year work program updates in April and early May 2007. Three questions were addressed. The questions and the TRT's review comments are below.

In 2007, the Hood Canal 3-year work program compiled recovery actions for both Mid-Hood Canal and Skokomish Chinook salmon populations and other ESA listed species (summer chum salmon and bull trout) into a single document. This TRT review, however, remains focused on the recovery actions for Mid-Hood Canal Chinook salmon, because the TRT analysis is based on the consistency of the actions with the recovery plan and only this population of Chinook salmon has a completed recovery plan. We have included general comments on the actions identified for Skokomish River Chinook salmon, but we await the recovery plan for that population to do a more thorough analysis.

TRT Questions

1. Is their work program consistent with the hypotheses and strategy for their watershed? (The 'work program' includes hypotheses and strategies in the Puget Sound Draft Plan, including the watershed plan, TRT review comments and NOAA Supplement comments).

This is difficult to judge. As noted in our comments in 2005 and 2006, the default strategy in the recovery plan is based on identifying limiting factors for Chinook salmon production and some recovery actions that target those limiting factors. In 2005, the TRT noted "no overall habitat recovery strategy was presented for the Mid-Hood Canal Chinook population," by which we meant that the plan did not describe the hypothesized links between habitat forming processes, land use practices, habitat restoration actions, habitat characteristics, and the status of the viable salmonid population (VSP) attributes. This remains the case. The habitat actions chosen for the work program follow the limiting factors analysis and are mostly well supported by EDT analyses in the recovery plan. This is consistent with the approach of the recovery plan and indicates that many of the actions could provide real biological benefits. The lack of an overall process-based habitat strategy, however, makes it difficult to determine whether the sequencing and timing of the work program are effectively aligned (see below). The consequence of this is that it is much more difficult to be sure that the projects will work as well as we hope they will.

2. Is the sequencing and timing of their work program appropriate for the first 3 years of implementation?

This is difficult to judge. The prioritization of the habitat projects in Mid-Hood Canal appears to be based on rankings from EDT analyses of mostly "in-stream" actions that if they fixed a given limiting factor in specific problem reaches would have the greatest biological benefit to the fish and a qualitative assessment of the likelihood of implementation. Overall, projects addressing the more significant limiting factors are proposed to be done first. It is not clear from the documentation provided for the EDT analyses, that modeling the effects of different sequences of the projects in order to understand either the synergistic or antagonistic effects was part of the analysis. Similarly, without better hypotheses of the habitat forming processes and interactions with land uses at work in these watersheds, it is difficult to assess whether in-stream habitat restoration, such large woody debris projects and engineered logjams will be successful without addressing combinations of out-of-stream factors, such as road decommissioning or other upland land uses, that might be altering natural processes. It is not clear from our current information how much alternative combinations and sequences of actions might be better or not.

The projects listed for the Skokomish watershed range from upstream passage in the North Fork to modifying silviculture practices to restoration of the river and estuary. This range of projects appears to address many of the landscape forming processes and affects of land uses in the watershed, but the TRT will need more information on the hypothesized relationships between these and VSP characteristics of the population to do a more thorough review. We look forward to seeing these in the recovery plan. Clearly some of

the projects are more important for short-term recovery of Chinook salmon in the watershed and others are more important for their longer-term benefits or multi-species benefits. Combining both process-based hypotheses and quantitative analyses of limiting factors in different reaches, such as using the EDT or SHIRAZ models, would ultimately provide the watershed with useful ways of identifying how to prioritize and sequence these projects.

3. Are there significant components missing from the work program? If so, what are these and what can be done about them in the 3-year work program or at a regional scale?

Only some of the essential components for Mid-Hood Canal are listed in the work program. No hatchery actions or capital projects are listed and likewise H-integration appears to be missing. Harvest management is limited to identifying needs for greater technical capacity. Missing is any detail about actions in these non-habitat management sectors (e.g. harvest, hatcheries, adaptive management) that is comparable to the actions or projects identified in the work program and the Appendix C for habitat. Although the TRT understands and supports the current focus on simply identifying needs for improving technical capacity in these management sectors, we strongly recommend the co-managers and Hood Canal Coordinating Council begin identifying and prioritizing the action items that need to be accomplished in the sectors.

Shared Strategy Objectives

1. Improve the level and certainty of protection for habitat and the 22 existing populations?

The work program focuses mostly on habitat restoration rather protection actions. Likewise, the recovery plan relies on the existing regulatory actions in the national forest and on county, city, and private lands for habitat protection rather than new protection actions. A TRT analysis indicated that the Mid-Hood Canal watersheds ranked in the highest one-third of the Puget Sound Chinook salmon watersheds for ecological integrity[1] and the Skokomish watershed ranked in the middle third. That these levels of ecological integrity remain most likely partially reflects the protections provided to these watersheds by the Olympia National Park and Forest, which cover a large proportion of these watersheds. A key issue for the ESU, therefore, is how these regulatory protection and others on private or state lands will continue to work in Hood Canal watersheds. The work program does contain several actions focused on implementation monitoring of regulatory programs (mostly for summer chum salmon but this could be applicable to Chinook salmon in some areas). These would need to be expanded to ensure better certainty.

[1] Puget Sound TRT. 2006. Ecological integrity of Chinook salmon watersheds in the Puget Sound and population status.

2. Preserve options for achieving the future role of this population in the ESU?

No indigenous populations of Chinook salmon remain in Hood Canal. The Mid-Hood Canal Chinook population is currently managed for natural production but the natural production is historically largely derived from strays from large scale hatchery production in Hood Canal. Likewise, the current Skokomish River population is derived largely from introduced hatchery fish of Green River lineage. Consequently, existing local hatchery programs are maintaining the opportunity to use these fish for recovering these populations. These are not covered in the work program. The importance of protecting habitat to preserve options for these populations is covered in question #1 (above).

3. Ensure protection and restoration preserves and restores ecosystem processes for Chinook salmon?

The habitat projects are intended to help restore ecosystem process. As noted early, we did not have enough information to judge whether these are the right locations or magnitudes to have that effect.

4. Advance the integrated management of harvest, hatchery, and habitat?

This is not described in the work program.

II. Policy Review Comments

The Recovery Council Work Group, an interdisciplinary policy team, evaluated each of the fourteen watershed work plans. The following questions guided the evaluation of the work plans updates.

1. Is the work program update consistent with the policy feedback and recommendations from the 2004 policy feedback summary, Recovery Plan Watershed Profiles – Results section, and NOAA's Federal Supplement?
2. Is the work program update tied to the objectives identified and at a pace sufficient to achieve the watershed's ten-year goals?
3. Are there significant elements missing and how might these be addressed?

In addressing these three questions, the interdisciplinary team noted accomplishments and strengths of the three-year work program update and also identified and discussed gaps and special issues warranting attention. A short discussion of comments common to all watersheds is provided below, followed by a comments specific to the Hood Canal recovery plan area.

General comments on 2007 watershed work program updates

Although the watershed 2007 work program updates reflect advancement in terms of project identification, many of the watersheds continue to have gaps, to varying degrees,

that were identified in the 2006 work program review. Regional assistance to the watershed planning teams will be needed to address how best to fill the needs identified below.

Work Plan Accomplishments, Sequencing and Prioritization: Work program updates are a useful tool for defining progress toward plan goals and ESU-wide recovery. Narratives should be crafted to give a sharper focus on what each watershed expects to accomplish within the three-year period and identifying alternatives if they are unable to implement a given suite of actions. All work program updates could be strengthened by providing more focus on how projects and actions are prioritized and sequenced. It is also important that the narrative provide sufficient information to enable watershed teams and regional reviewers to determine whether the pace of implementation is appropriate to achieve each watershed's ten-year goals.

Integrated Management of Habitat, Harvest and Hatcheries: All Puget Sound watersheds' work programs would benefit from additional efforts to achieve H-Integration. During 2006, all watersheds with Chinook populations have engaged in actions that reflect increased attention to the integrated management of habitat, harvest and hatchery. By the end of 2008, it is anticipated that those watersheds will have completed or substantially advanced efforts to accomplish the 6 Step process developed at the regional level by the H-Integration sub-group of the Adaptive Management and Monitoring Steering Committee. The Shared Strategy and TRT liaisons will continue to assist watersheds without independent Chinook populations concerning integrated management and the capacity of the nearshore to sustain natural- and hatchery-origin populations of all salmonids.

Monitoring and Adaptive Management: A regional monitoring and adaptive management plan is currently being drafted by Shared Strategy staff along with a work group of technical experts, which will guide monitoring efforts at the regional and fish population scales. Some watersheds have already begun putting together their own monitoring and adaptive management frameworks and initial monitoring tasks. The regional team will coordinate with those watersheds to ensure that both of the monitoring and adaptive management plans are consistent and complementary with each other. During the intervening time, the Shared Strategy staff, work group and TRT acknowledge that they play an important role in providing assistance during the coming year to ensure that all Puget Sound watersheds can engage in a coordinated and efficient process to develop, refine and implement a robust monitoring and adaptive management approach. This will enable watersheds and the region to assess progress in reducing uncertainties in the population and ESU-wide recovery. Shared Strategy anticipates that the regional plan will be adopted by the Recovery Council by the end of 2007. In the meantime, the Puget Sound TRT and Shared Strategy liaisons will assist watersheds who are poised to take the next steps in the development of their watershed monitoring and adaptive management plans.

Protecting and restoring ecosystem processes for Chinook and other species by preserving options and addressing threats are critical components of recovery planning both at the local and regional scale. Recovery actions have progressed from relatively straightforward

work to complex and more expensive multi-year projects. All watersheds are challenged in terms of their capacity to acquire land in order to secure future options, and to implement the large-scale projects. The Shared Strategy staff and work group members acknowledge that additional efforts are needed at the regional scale to assist in securing resources that will enable watersheds to protect restoration options in rapidly developing areas and to implement projects at an appropriate pace to achieve ESU-wide recovery.

Water quality and Water Quantity: Water quality and water quantity will continue to be important issues for the long-term recovery of all populations within the ESU.

Work on water quality issues is within the authority of the Washington State Department of Ecology and will be primarily pursued through its implementation of the NPDES permit program and the establishment of TMDLs under the Clean Water Act throughout the ESU. However, watersheds can play an important role in ensuring that local jurisdictions implementing NPDES permits adopt water quality programs that include actions and regulations that protect and enhance water quality in rivers and streams that are critical for salmon recovery.

At the regional level, a work group has been established on instream flows to determine how to move forward the protection strategy identified in the Recovery plan. At present, the Plan calls for a 3-pronged approach to improving instream flows: (1) setting and/or revising instream flows under the authority of the Department of Ecology; (2) improving our scientific understanding of fish population needs in relation to instream flows, groundwater dynamics and relationship to surface water, as well as the implications of climate change on instream flows over time; and (3) coordinating water management decisions and actions within each watershed to avoid further degradation of instream flow conditions through the creation of Protection and Enhancement Programs (PEPs). Watersheds will play an important role in moving these issues forward in the near term. Each watershed should consider (1) advocating for appropriate instream flow rules in places where they are needed; (2) participating in the development of new science by sending technical staff to instream flow workshops planned in 2007; and (3) working with the Department of Ecology to begin creating PEPs in areas where instream flows hinder the recovery of fish populations. The TRT and Shared Strategy liaisons will assist watersheds in advancing water quantity and water quality actions.

Comments specific to the Hood Canal watershed work program update

The work program update reflects capital and non-capital projects and actions that are consistent with the previous policy feedback and is tied to objectives identified in the watershed's ten-year goals. There is insufficient information to determine whether actions are being implemented at a pace sufficient to achieve the watershed's ten-year goals. Significant gaps remain, though advances have been made in addressing concerns noted in previous comments, as noted below.

Significant advances:

- Discussions with the North Olympic Planning Lead Entity have been initiated concerning project identification and selection in connection with implementation of the Hood Canal & Eastern Strait Summer Chum Recovery Plan;
- Update includes more comprehensive Skokomish Chinook population recovery actions; and
- Habitat limiting factors associated with habitat capital projects are noted.

Issues needing advancement:

- Skokomish Chinook population recovery plan and recovery goals needed;
- Extending H-Integration efforts focused on Hamma Hamma Chinook in the Mid-Hood Canal Chinook Recovery Plan to address integrated management of the Hs within the broad context of all of the listed populations;
- Hatchery and Harvest management support actions and costs not included in the work program update;
- Monitoring and Adaptive Management Plan particularly important given the need to address interactions and project impacts on Chinook, summer chum, bull trout and steelhead recovery;
- An explicit discussion and actions addressing flows and protection is needed;
- A firm US Forest Service commitment and funding for road drainage, stabilization and decommissioning projects is needed;
- Capacity needs to implement the work program are likely to be higher than reflected in the update; and
- Update would benefit from including cross references to the summer chum recovery plan, which outlines work with local jurisdictions to assess the effectiveness of regulatory and voluntary protection measures as it applies to other listed species.